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# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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OK  
cc: Pete Hess  
for follow up

March 20, 2002

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor *DRH*

FROM: James D. Smith, Senior Reclamation Specialist *JDS*

RE: 2001 Third Quarter Water Monitoring, Andalex Resources, Inc., Wildcat Loadout, C/007/033-WQ01-3

1. Were data submitted for all of the MRP required sites? YES [X] NO [ ]

*Identify sites not monitored and reason why, if known:*

There was no flow at WCW-3 and WCW-4 during the third quarter of 2001.

2. On what date does the MRP require a five-year resampling of baseline water data.

*See Technical Directive 004 for baseline resampling requirements. Consider the five-year baseline resubmittal when responding to question one above. Indicate if the MRP does not have such a requirement.*

### Resampling Due Date

In the year preceding renewal, one sample at low flow and one at high flow for baseline analyses. Renewal submittal due 01/05/04, renewal due 05/05/04.

3. Were all required parameters reported for each site? YES [ ] NO [X]

*Comments, including identity of monitoring site:*

Field pH, field specific conductivity, and field water temperature were not measured.

Analyses were done for total, rather than dissolved, Ca, Mg, Mn, K, and Na.

Analysis was done for dissolved rather than total iron.

**4. Were irregularities found in the data?**

YES ☒ NO ☐

*Comments, including identity of monitoring site:*

Cation-anion balance was greater than 5% because analyses were done for total rather than dissolved metals.

Other reported values are within two standard deviations of average, although some of the values are new maximums. There are only three samples from WCW-1 and WCW-2 recorded in the database, so there is poor basis for statistical comparisons.

**5. Were DMR forms submitted for all required sites?**

1<sup>st</sup> month, YES ☒ NO ☐

2<sup>nd</sup> month, YES ☒ NO ☐

*Identify sites and months not monitored:*

3<sup>rd</sup> month, YES ☒ NO ☐

There was no UPDES discharge all three months.

**6. Were all required DMR parameters reported?**

YES ☒ NO ☐

*Comments, including identity of monitoring site:*

There was no UPDES discharge all three months.

**7. Were irregularities found in the DMR data?**

YES ☐ NO ☒

*Comments, including identity of monitoring site:*

**8. Based on your review, what further actions, if any, do you recommend?**

The operator needs to be more diligent in measuring field parameters.

The monitoring plan in Table IV-10 of the Wildcat MRP does not include total iron, a parameter required by the Coal Mining Rules. In the mid-term permit review, the Division has asked that it be clarified in Table IV-10 that iron and manganese are to be analyzed for both total and dissolved concentrations and that other metals are to be analyzed for dissolved concentrations.